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Attorneys for Defendants
UBER TECHNOLOGIES, INC.;
RASIER, LLC; and RASIER-CA, LLC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

This Document Relates to:

PLAINTIFF B.F.
Case No. 3:25-cv-04466

PLAINTIFF H.S.01
Case No. 3:25-cv-01999

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF LAURA VARTAIN
HORN IN SUPPORT OF UBER'S
ADMINISTRATIVE MOTION TO SEAL
PERSONALLY IDENTIFYING
INFORMATION CONTAINED IN
DEFENDANTS' OPPOSITION TO
MOTIONS TO WITHDRAW**

Judge: Hon. Charles R. Breyer
Courtroom: 6 – 17th Floor

1 I, Laura Vartain Horn declare as follows:

2 1. I am an attorney licensed to practice before all state courts in California and the Northern
3 District of California federal court. I am an attorney at Kirkland & Ellis L.L.P., counsel of record for
4 Defendants Uber Technologies, Inc., Raiser, LLC, and Raiser-CA, LLC (collectively, “Uber” or
5 “Defendants”). I offer this Declaration in the above-captioned matter in support of Uber’s Administrative
6 Motion to Seal Personally Identifying Information Contained in Defendants’ Opposition to Motions to
7 Withdraw.

8 2. Counsel for Uber previously met and conferred with Chaffin Luhana concerning the
9 sealing of personally identifying information (“PII”) in connection with Uber’s Motion for Entry of an
10 Order to Show Cause Why Plaintiffs Who Have Submitted Non-Bona Fide Receipts Should Not Be
11 Dismissed with Prejudice. ECF 3602-1. Chaffin Luhana did not oppose sealing the PII contained in that
12 motion, and the Court granted Uber’s motion to seal. ECF 3616. The sealed information contained in
13 Defendants’ Opposition to Motions to Withdraw is a subset of the PII that has already been filed under
14 seal, unopposed by Chaffin Luhana.

15 I declare under penalty of perjury under the laws of the State of California and the laws of the
16 United States of America that the foregoing is true and correct.

17 Dated: August 19, 2025

Respectfully submitted,

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19 By: /s/ Laura Vartain Horn
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24 LLC; and RASIER-CA, LLC
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